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17 [Additional counsel appear on signature page.]

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN JOSE DIVISION

21 In re CISCO SYSTEMS, INC. SECURITIES)
LITIGATION)

Master File No. C-01-20418-JW(PVT)

22 _____)

CLASS ACTION

23 This Document Relates To:)

STIPULATION AND ~~[PROPOSED]~~ ORDER
REGARDING PRETRIAL SCHEDULE

24 ALL ACTIONS.)

MODIFIED BY THE COURT

25 _____)

26 _____)

27 _____)

28 _____)

WHEREAS, the July 2, 2003 Amended Scheduling Order provides for a pretrial schedule as follows:

Plaintiffs' Expert Reports Due	July 29, 2005
Defendants' Expert Reports Due	July 29, 2005
Plaintiffs' Rebuttal Reports Due	August 8, 2005
Defendants' Rebuttal Reports Due	August 8, 2005
Objections to Experts Due	September 12, 2005
Fact Discovery Cut-Off	September 30, 2005
Expert Discovery Cut-Off	September 30, 2005
Pretrial Motions Due	January 24, 2006
Pretrial Motion Hearing	February 27, 2006
Pretrial Conference	April 24, 2006
Joint Pretrial Statement Due	May 12, 2006
Motions in <i>Limine</i> Due	June 2, 2006
Final Pretrial Conference	June 12, 2006
Trial	June 27, 2006

WHEREAS, the parties have engaged in substantial fact discovery to date, including written discovery, document production and depositions;

WHEREAS, the parties anticipate completing all fact discovery by September 30, 2005;

WHEREAS, the parties believe it would be more efficient to conduct expert discovery after fact discovery is concluded;

WHEREAS, the parties have been unable to agree on the proper sequencing of the disclosure of experts and expert reports. The parties intend to submit to the Court alternative proposed orders on this issue accompanied by a brief supporting memorandum from each party;

THEREFORE, the parties, through their counsel of record, hereby stipulate to the following pretrial schedule which does not alter the existing fact discovery cut-off:

1	Fact Discovery Cut-Off	September 30, 2005
2	Plaintiffs' Expert Reports Due	TBD
3	Defendants' Expert Reports Due	TBD
4	Rebuttal Reports Due	TBD
5	Expert Discovery Cut-Off	February 24, 2006
6	Dispositive Motions Filed	March 6, 2006
7	Oppositions to Dispositive Motions Filed	April 24, 2006
8	Replies to Dispositive Motions Filed	May 22, 2006
9	Hearing on Dispositive Motions	June 9, 2006 June 12, 2006 @ 9am
10	Objection to Experts Due	June 30, 2006
11	Pretrial Conference (Preliminary)	July 14, 2006 7/17/05 @ 10am
12	Joint Pretrial Statement Due	August 14, 2006
13	Motions in <i>Limine</i> Due	September 8, 2006
14	Final Pretrial Conference	September 18, 2006 @ 3pm
15	Trial	Oct. 04, 2006 @ 9am September 29, 2006

16 IT IS SO STIPULATED.

17 DATED: April 4, 2005

18 LERACH COUGHLIN STOIA GELLER
19 RUDMAN & ROBBINS LLP
20 WILLIAM S. LERACH
21 SPENCER A. BURKHOLZ
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23 /s/ Daniel S. Drosman
24 DANIEL S. DROSMAN

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Co-Lead Counsel for Plaintiffs

1 I, Daniel S. Drosman, am the ECF User whose ID and password are being used to file this
2 Stipulation and [Proposed] Order Regarding Pretrial Schedule in compliance with General Order
45, X.B., I hereby attest that Carol Lynn Thompson has concurred in this filing.

3 DATED: April 4, 2005

HELLER EHRMAN WHITE & MCAULIFFE LLP
CAROL LYNN THOMPSON

5
6 /s/ Carol Lynn Thompson
CAROL LYNN THOMPSON

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Counsel for PricewaterhouseCoopers LLP

10 I, Daniel S. Drosman, am the ECF User whose ID and password are being used to file
11 this Stipulation and [Proposed] Order Regarding Pretrial Schedule in compliance with General
Order 45, X.B., I hereby attest that Robert Y. Sperling has concurred in this filing.

12 DATED: April 4, 2005

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14
15 /s/ Robert Y. Sperling
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19 Counsel for the Cisco Defendants

20 * * *

21 **ORDER**

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23
24 DATED: _____

THE HONORABLE JAMES WARE
UNITED STATES DISTRICT JUDGE

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28 S:\CasesSD\Cisco\S_O 00019798.doc

DECLARATION OF SERVICE

I hereby certify that on April 4, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys denoted on the attached Service List. I hereby certify that I have caused this document to be mailed by the United States Postal Service and/or faxed to the non-CM/ECF participants listed on the attached Service List.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of April, 2005, at San Diego, California.

s/Daniel S. Drosman
DANIEL S. DROSMAN

CISCO (FEDERAL-LEAD)

Service List - 4/4/2005 (201-110-1)

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Service List - 4/4/2005 (201-110-1)

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